

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

UNITED STATES OF AMERICA)	CR. NO. <u>8:22-cr-151</u>
)	18 U.S.C. § 2320(a)
)	18 U.S.C. § 2323
vs.)	28 U.S.C. § 2461(c)
)	
M&L EXECUTIVE ENTERPRISES, LLC)	<u>INFORMATION</u>

THE UNITED STATES ATTORNEY CHARGES:

That in or about June 2020, and continuing until on or about June 14, 2021, in the District of South Carolina and elsewhere, the Defendant, M&L EXECUTIVE ENTERPRISES, LLC, did intentionally traffic in goods such as purses and wallets, while knowingly using on and in connection with such goods counterfeit marks, to wit, spurious marks identical to and substantially indistinguishable from those belonging to the rightful owners, marks that were in use and registered for those goods on the principal register of the United States Patent and Trademark Office, the use of which counterfeit marks were likely to cause confusion, to cause mistake, and to deceive;

All in violation of Title 18, United States Code, Section 2320(a).

FORFEITURE

TRAFFICKING COUNTERFEIT GOODS:

Upon conviction for violation of Title 18, United States Code, Section 2320 as charged in this Information, the Defendant, M&L EXECUTIVE ENTERPRISES, LLC, shall forfeit to the United States any counterfeit marks, any goods or services on or in connection with which any counterfeit marks are used, any property used or intended to be used, in any manner or part, to commit or facilitate the commission of the offense, and any property, real or personal, which constitutes or is derived from any proceeds the Defendant obtained, directly or indirectly, as the result of such violation, and any property traceable to such violation.

PROPERTY:

Pursuant to Title 18, United States Code, Section 2323 and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendant for the offense charged in this Information includes, but is not limited to, the following:

(a) **Proceeds/Forfeiture Judgment:**

A sum of money equal to all proceeds the Defendant obtained, directly or indirectly, from the offense charged in this Information, and all interest and proceeds traceable thereto, and/or such sum that equals all property derived from or traceable to Defendant's violation of Title 18.

(b) **Counterfeit Goods:**

Miscellaneous counterfeit marks and goods, including belts, clothing, wallets, footwear, purses, hats, and shoes in connection with which counterfeit marks were knowingly used.

(c) **Cash/United States Currency:**

\$107,344.00 in United States Currency
Seized from: Missy Thomas

SUBSTITUTE ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant-

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third person;
- c. Has been placed beyond the jurisdiction of the court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28 United States Code, Section 2461(c), to seek forfeiture of any other property of the Defendant up to the value of the forfeitable property.

Pursuant to Title 18, United States Code, Section 2323 and Title 28, United States Code, Section 2461(c).


M. RHETT DEHART
ACTING U.S. ATTORNEY